



July 22, 2021

VIA ELECTRONIC FILING

Lisa Fowlkes, Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: *Wireless Emergency Alerts; Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91, 15-94

Dear Chief Fowlkes,

The Wireless Emergency Alerts ("WEA") system is one of our nation's most effective emergency alerting tools for federal, state, and local alert originators. Success of the WEA system is premised on the public-private partnership among alert originators, the Federal Communications Commission ("FCC" or "Commission"), the Federal Emergency Management Agency ("FEMA"), and participating Commercial Mobile Service Providers ("CMSP"). Since the system's first launch in 2012, over 61,000 WEAs have been sent throughout the United States to warn and inform millions of wireless consumers about imminent threats (such as tornados, wildfires, and hurricanes), abducted children (AMBER alerts), and various other emergencies. Given the importance of WEAs to our nation's alert and warning practices, CTIA and its member companies remain committed to working with the Commission and FEMA to enhance the WEA system.

As you have noted previously, participating CMSPs and manufacturers delivered a "big improvement" to the WEA system in 2019, including by expanding WEA message content, adding multilingual support, and enhancing geo-targeting, among other capabilities.¹ Implementing these

¹ See *Wireless Emergency Alerts: A Preparedness Tool*, Lisa M. Fowlkes, Chief, Public Safety and Homeland Security Bureau, FCC Blog (Sept. 10, 2020), <https://www.fcc.gov/news-events/blog/2020/09/10/wireless-emergency-alerts-preparedness-tool> ("FCC Blog"); *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91, 15-94, Second Report and Order and Second Order on Reconsideration, 33 FCC Rcd 1320, 1322-23 ¶ 4 (2018) ("*2018 WEA Order*") (noting in September 2016, the



enhancements to the WEA system required significant collaboration among participating wireless providers, equipment manufacturers, and FEMA. We are pleased to see that alert originators have used these new features to inform and warn wireless consumers about imminent threats. For example, throughout the unprecedented response to COVID-19, over 120 alert originators across the United States have sent more than 570 WEAs with vital information related to the pandemic. In addition, alert originators sent more than 490 WEAs to warn consumers about wildfire threats last year, and over 440 WEAs were sent to those in the path of hurricanes Laura, Sally and Delta.²

While alert originators are already taking advantage of the new WEA capabilities, the Commission has also recognized that wireless handsets compatible with the updated features will be “more widely available over time, as consumers purchase new smartphones.”³ In an effort to keep the Commission better apprised of progress in this regard, CTIA submits the following wireless industry estimates of current and projected market penetration rates of mobile devices that support enhanced WEA geo-targeting.⁴

Current Nationwide WEA 3.0 Handset Availability: Using International Data Corporation (“IDC”) data on handset shipments in the United States in 2020 and Q1 2021, and the share of such handsets that are WEA 3.0 capable, we have calculated a WEA 3.0 penetration figure of **34 percent of active smartphones**, an increase from ~18 percent of active smartphones last year.⁵

Commission adopted the *WEA Report and Order* to improve Alert Message content and delivery, and to create public safety tools for testing and outreach, and also adopted the *WEA Further Notice of Proposed Rulemaking*, seeking comment on, among other proposals, measures to further improve emergency managers’ ability to geographically target (geo-target) Alert Messages, to preserve Alert Messages on mobile devices for consumer review until they expire, and to define the extent of participation in WEA).

² See Comments of CTIA, PS Docket 11-60, at 16-18 (filed April 26, 2021).

³ See FCC Blog, *supra* note 1.

⁴ Letter from Chairman Pai, FCC, to Meredith Atwell Baker, President & CEO, CTIA (Sept. 10, 2020); Letter from Matthew Gerst, CTIA, to Lisa Fowlkes, Chief, Public Safety & Homeland Security Bureau, FCC, PS Docket Nos. 15-91, 15-94, at 2 (Oct. 1, 2020) (noting that CTIA will annually update the FCC through 2023 with third-party data estimates of WEA 3.0 capable handset penetration in the market and, further, that CTIA makes no representations or warranties as to the completeness, accuracy, or timeliness of third-party data used to establish these estimates).

⁵ This estimate was developed using the same formula that was presented to the Commission last year, which is based upon reported smartphone gross adds and upgrades, total smartphone sales, and the share of WEA 3.0 capable devices shipped versus the number of reported active smartphones. An alternate calculation based upon Strategy Analytics’ smartphone replacement rates, the reported active smartphones at the beginning of the annual



Handset Adoption Estimates: Given the reported handset lifetime of ~35 months [estimated](#) by Strategy Analytics in June 2021, and the annual and quarterly trend in the share of WEA 3.0 capable smartphones, we continue to project that such handsets will amount to a **majority of active smartphones in use in 2022.**

CTIA and its member companies appreciate the Commission's dedication to enhancing the WEA system and are very pleased with the progress that the wireless industry and FEMA have made on delivering new WEA features to consumers. We look forward to continuing to work with the Commission to ensure that WEA remains a vital tool for helping alert originators keep all Americans safe.

Sincerely,

[/s/ Matthew Gerst](#)

Matthew Gerst
Vice President, Regulatory Affairs

cc: Lisa Fowlkes
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period, and IDC's WEA 3.0 share data, would produce a WEA 3.0 penetration figure of 41 percent. See Strategy Analytics, Global Smartphone Replacement Rate/Cycle Forecast by 88 Countries: 2008-2026 (June 2021); Annual Wireless Industry Survey, CTIA (2020); and Annual/Quarterly Smartphone Shipment Data, IDC (2021). CTIA presents both formulas for the Commission's consideration. Notably, wireless consumers and other interested stakeholders can review a wireless providers' list of WEA-capable handsets to determine if a specific device supports WEA 3.0 on their individual webpages.